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Our File: 78494.1

Regional Freedom of Information Officer
U.S. EPA, Region 2
290 Broadway, 26th Floor
New York, NY 10007-1866

Re: Hug, et al. v. Brenntag North America, Inc., et al.
Docket No. MID-L-4862-15AS

Dear Sir/Madam:

This firm is co-counsel for Plaintiffs in the above-referenced matter, presently pending in Middlesex County Superior Court of New Jersey. Kindly accept this letter as a request for EPA's records and documents as they relate to the following for the time period 1940 to 1990:

- 1) All reports, studies, evaluations, investigations, conferences, communications, testing, and research relating to asbestos in talc;
- 2) All documents, records, correspondence, memorandums, communications, investigations, and information concerning Coty and asbestos;
- 3) All documents, records, correspondence, memorandums, communications, investigations, and information regarding investigation, testing, or analysis of Coty talc and talc-containing products for asbestos;
- 4) All documents, records, correspondence, memorandums, communications, investigations, and information concerning Pfizer and asbestos;
- 5) All documents, records, correspondence, memorandums, communications, investigations, and information regarding investigation, testing, or analysis of Pfizer talc and talc-containing products for asbestos;
- 6) All documents, records, correspondence, memorandums,

communications, investigations, and information concerning Whittaker, Clark & Daniels, Inc. and asbestos;

- 7) All documents, records, correspondence, memorandums, communications, investigations, and information regarding investigation, testing, or analysis of Whittaker, Clark & Daniels, Inc. talc and talc-containing products for asbestos;
- 8) All documents, records, correspondence, memorandums, communications, investigations, and information concerning Mennen and asbestos;
- 9) All documents, records, correspondence, memorandums, communications, investigations, and information regarding investigation, testing, or analysis of Mennen talc and talc-containing products for asbestos;
- 10) All documents, records, correspondence, memorandums, communications, investigations, and information concerning Faberge and asbestos;
- 11) All documents, records, correspondence, memorandums, communications, investigations, and information regarding investigation, testing, or analysis of Faberge talc and talc-containing products for asbestos;
- 12) All documents, records, correspondence, memorandums, communications, investigations, and information concerning Unilever and asbestos;
- 13) All documents, records, correspondence, memorandums, communications, investigations, and information regarding investigation, testing, or analysis of Unilever talc and talc-containing products for asbestos;
- 14) All documents, records, correspondence, memorandums, communications, investigations, and information concerning Shulton and asbestos;
- 15) All documents, records, correspondence, memorandums, communications, investigations, and information regarding investigation, testing, or analysis of Shulton talc and talc-containing products for asbestos;
- 16) All documents, records, correspondence, memorandums, communications, investigations, and information concerning Helen of Troy and asbestos;

- 17) All documents, records, correspondence, memorandums, communications, investigations, and information regarding investigation, testing, or analysis of Helen of Troy talc and talc-containing products for asbestos;
- 18) All documents, records, correspondence, memorandums, communications, investigations, and information concerning L'Oreal and asbestos;
- 19) All documents, records, correspondence, memorandums, communications, investigations, and information regarding investigation, testing, or analysis of L'Oreal talc and talc-containing products for asbestos;
- 20) All documents, records, correspondence, memorandums, communications, investigations, and information concerning Helena Rubinstein and asbestos;
- 21) All documents, records, correspondence, memorandums, communications, investigations, and information regarding investigation, testing, or analysis of Helena Rubinstein talc and talc-containing products for asbestos.

Please note this firm agreeing to pay fees up to or above \$25.00. If there are any further questions, please do not hesitate to contact me by telephone or email, rlytle@szaferman.com.

Thank you.

Very truly yours,

SZAFERMAN, LAKIND,
BLUMSTEIN & BLADER, P.C.

Robert E. Lytle

REL/amk
encl.
c: Leah Kagan, Esq.